



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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NCBC DAVISVILLE
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12 October 2000

Mr. John Mayhew, Remedial Project Manager
US Department of the Navy, Northern Division
Code 1811, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Work Plan Addendum
Remedial Investigation of IR Program Site 16
(Former Creosote Dip Tank and Fire Fighting Training Area)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 25 September 2000, Dated September 2000

Dear Mr. Mayhew;

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and comments are provided below:

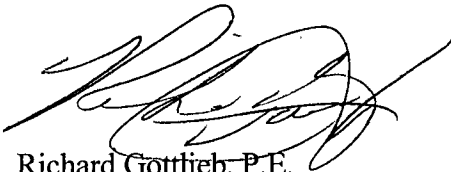
1. **Page 3-1, Section 3.2, Field Program, Item 1, Sentence 1** - Please change "north of Site 16" to "west of Site 16."
2. **Page 3-2, Section 3.2, Field Program, Item 5, Paragraph 2** - In addition to the 25 new monitoring wells, wells MW16-05S and MW16-01S are also planned to be replaced for a total of 27 wells. This section only proposes sampling for the 25 new monitoring wells. It would seem reasonable to also sample the two replacement wells to at least have baseline data on them. It is requested the work plan be changed accordingly.
3. **Page 3-2, Section 3.3, Human Health Risk Assessment** - The protocol for the human health risk assessment is described in the Work Plan dated March 2000. In Section 3.3.1 of the March 2000 work plan it is stated that the site will be evaluated for a commercial/industrial scenario, however, a residential exposure scenario will be evaluated to assess the potential for unrestricted transfer of the property. It is implied that if the results of the sampling do not meet residential standards then a deed restriction will be placed on this parcel of land. The parcel is currently utilized as a

yacht club and this use is reasonably anticipated into the future. Under the RIDEM Remediation Regulations (amended 1996) this is a recreational use for which the residential standards are applied. Given the current and future use of the site, the human health risk assessment should focus on a residential scenario. If the site does not meet residential standards then more than a deed restriction may be necessary to allow for the continued use of the site.

4. **Page 4-2, Section 4.4, Drilling and Subsurface Soil Sampling, Paragraph 3** – This paragraph states that no soil samples will be collected for laboratory analysis. Please explain the rationale for this. The results of the soil sampling (VOC, SVOC, PCBs, pesticides, and metals) could help us understand the contamination in the groundwater (source could also be in the soil).
5. **Page 4-3, Section 4.4.1, Soil Boring and Sampling, Paragraph 1, Sentence 3** – The calibration of the PID should be checked at the end of the day to document that readings taken after lunch are also accurate. Please revise the work plan accordingly.

RIDEM would like to thank you for the opportunity to comment on this work plan. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', with a stylized flourish at the end.

Richard Gottlieb, P.E.
Principal Engineer

Cc: C. Williams, EPA Region 1
W. Davis, CSO NCBC
H. Cohen, RIEDC
S. Licardi, ToNK
J. Shultz, EA Eng.